

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD)(SN) ECF Case
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This document also relates to member case:

Hugh A. Chairnoff, et al. v. Islamic Republic of Iran, 1:18-cv-12370 (GBD) (SN)

I, SUSAN M. DAVIES, declare, pursuant to 28 U.S.C. Section 1746, as follows:

1. I am an attorney associated with the law firm of Fleischman Bonner & Rocco LLP, one of four law firms representing the Plaintiffs, including Jamie K. Hawkins, in the above-captioned *Hugh A. Chairnoff, et al. v. Islamic Republic of Iran, 1:18-cv-12370-GBD-SN* (the “*Chairnoff* Action”) and MDL. Ms. Hawkins is the step-daughter of the late Geoffrey E. Guja, a New York City firefighter who was killed in the collapse of the World Trade Center on September 11, 2001. I submit this declaration in support of entry of the Proposed Order Adopting Report and Recommendation and Partial Final Judgment for Jamie K. Hawkins filed contemporaneously herewith.

2. On September 27, 2022, Magistrate Judge Sarah Netburn entered a Report and Recommendation [ECF 8566] recommending that the Court grant Ms. Hawkins’s motion for entry of default judgment against the Islamic Republic of Iran, and award to Ms. Hawkins the full \$8,500,000 solatium award for children on September 11 victims. In her Report, Magistrate Judge Netburn advised the parties that failure to file timely objections to the Report would constitute a waiver of those objections on appeal. No objections to the Report have been filed.

3. The Clerk of Court requires proposed judgments filed in this MDL to include a blank line for insertion of a liquidated pre-judgment interest amount. The Proposed Order

Adopting Report and Recommendation and Partial Final Judgment for Jamie K. Hawkins that is filed contemporaneously herewith complies with that directive. In order to assist the Clerk in calculating the pre-judgment interest on Ms. Hawkins's damages award, I used the on-line compound interest calculator app at www.thecalculatorsite.com to calculate that the interest on \$8,500,000 at the rate of 4.96% compounded annually from September 11, 2001 through September 11, 2022 (a period of 21 years) is \$14,991,956.50. For each day after September 11, 2022, the applicable interest rate of 4.96% applied to the total amount of \$23,491,956.50 (comprising \$8,500,000 damages + \$14,991,956.50 in prejudgment interest as of September 11, 2022) produces daily interest of \$3,192.33. Accordingly, were the Court to enter the proposed judgment in Ms. Hawkins's favor on November 18, 2022, for example, the prejudgment interest award would be $\$14,991,956.52 + (\$3,192.33 \times 68 \text{ days}) = \$15,209,034.90$.

4. I respectfully request that this Honorable Court to adopt Magistrate Judge Netburn's Report and Recommendation in full, and enter judgment in favor of Jamie K. Hawkins and against the Islamic Republic of Iran in the amount of \$8,500,000 in compensatory damages plus a liquidated amount of interest at the rate of 4.96% compounded annually calculated from September 11, 2001 through the date of entry of the judgment.

I declare under penalty of perjury that the foregoing is true and correct. Executed in New York, New York on November 17, 2022.

/s/ Susan M. Davies
SUSAN M. DAVIES